

## DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. R97-~~4~~

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS THOMPSON  
(USPS/OCA-T-100—1-10)

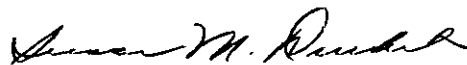
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Thompson: USPS/OCA-T-100—1-10.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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January 8, 1998

USPS/OCA-T100-1. Please refer to OCA-LR-6, footnote 1 on page 3 and the third line on page 24. Do the terms "my results" on page 3 and "I put" on page 24 refer to you?

USPS/OCA-T100-2. Please specify all the computer software and hardware requirements used in programming, executing and producing OCA's version of the Commission's cost model. The description should include names, version numbers and any modifications of software or hardware.

USPS/OCA-T100-3. Please refer to the description of updating the COMP.TXT file on pages 7-12, Section III.A of OCA-LR-4.

- a. Please confirm that the referenced PRCCOMP.XLS file is from Docket No. MC96-3, PRC-LR-5, Part 1, on pages 1-12 of the section entitled "Component Titles".
- b. Please confirm that on page 3 of Docket No. MC96-3 PRC-LR-5, Part 1, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
9	Special Delivery Messengers-Salaries - Office	901	58

- c. Please confirm that on page 11 of Docket No. MC96-3 PRC-LR-5, Part I, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
21	Reserved for Special Delivery Salaries Key	2159	58

- d. Please confirm that on page 3 of Docket No. R97-1 OCA-LR-6, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
9	Special Delivery Messengers-Salaries - Office	901	58

- e. Please confirm that on page 11 of Docket No. R97-1, OCA-LR-6, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
21		2159	61

- f. Please refer to the comment on page 9 of OCA-LR-4: "[a]n additional source of Postal Service component numbers is USPS library reference H-4 at 221-250". Confirm that on page 228 of USPS LR-H-4, component 58 is defined as "Special Delivery Messengers, Salaries, Office" and component 61 is defined as "Special Delivery Messengers, Total Salaries".

- g. In light of the explanation on pages 8-9 of OCA-LR-4 that USPS component 58 is associated with both Commission components 901 and 2159, please explain your understanding of USPS components 58 and 61, and of Commission components 901 and 2159. Include in your explanation your definition of each of the components, and the volume variable and accrued dollar amounts for each component as shown in the Manual Input Requirement for both the Postal Service's and the OCA's cost models.

USPS/OCA-T100-4. Please refer to pages 10-12 of OCA-LR-6. There are numerous PRC Component Numbers for which the associated USPS Component Number contains the phrase "see also". These PRC components are: 2110, 2115-2126, 2144, 2146-2147, 2151 and 2170-2173.

- a. For each of these PRC components, please explain to what documentation the "see also" refers. For example, are both USPS Component Numbers 364 and 96 associated with PRC Component Number 2144, and where is this documented?
- b. Please provide the correct USPS Component Number and cite the USPS documentation that provides the source of the information. For example, is USPS-LR-4 the source of the component numbers and definitions?
- c. If USPS-LR-4 is the source, please provide the page numbers on which the information can be found.
- d. Please provide any revised pages to OCA-LR-6 that may result.

USPS/OCA-T100-5. Please refer to pages 10-12 of OCA-LR-6. There are numerous PRC Component Numbers for which there is no associated USPS Component Number.

- a. Please provide the associated USPS Component Numbers and cite the documentation from which this information is taken.
- b. If there are any USPS Component Numbers that are not available for PRC Component Numbers, please explain why they are not required to execute the Commission's cost model.

USPS/OCA-T100-6. Please refer to page 9 of OCA-LR-4 and the sentence that reads "[t]he Postal Service's Base Year data file, B.DAT, (USPS library reference H-6, subdirectory \Ps420d01\Fy96mods) reflects the Postal Service's MIR with adjustments and indirect cost distributions". Also, refer to the response of Witness Patelunas, USPS-T5 to OCA interrogatory OCA/USPS-T5-5a that states "[t]he I.DAT data file provided on CD ROM in Postal Service Library Reference H-6, subdirectory "ps410d01/fy96mods" is the same file as USPS-T-5, Workpaper A-1, Manual Input Requirement".

- a. Please provide a complete explanation as to why you decided to use the B.DAT file rather than the I.DAT file for your version of the Postal Service's Manual Input Requirement.
- b. If the I.DAT file had been used, would you have needed the SAS conversion provided in OCA-LR-3?

USPS/OCA-T100-7. Please refer to the description on pages 11-14 of OCA-LR-4 of how PRCCOMP.XLS updates the Postal Service's B.DAT file to reflect the Postal Service's Manual Input Requirement.

- a. In Subpart b, it states that when a Postal Service component is deleted, "the Commission's component number in the PRCCOMP.XLS listing is retained for future use". Then, an example is given in which the Postal Service's component 6001 is deleted and the Commission's component 213 is retained for future use. Please confirm that when the Commission's component 213 is reused, it may be associated with any USPS component. If confirmed, please explain how the Commission's model avoids confusing the old USPS component number (6001) and the new USPS component number (other than 6001). If not confirmed, please explain the correct interpretation of the comment "retained for future use".
- b. Referring to Subpart c, please confirm that if component XX00, in segment XX, is moved to segment YY, it is renamed in the Commission's model to component number YY00. If confirmed, please describe in detail all of the modifications that would need to be made to the Commission's model to incorporate this change. If not confirmed, what would the renamed component number be and what modifications would need to be made to the Commission's model to incorporate this change?
- c. In the description provided in Subpart d, there is a discussion of Commission component 301 and USPS components 35 and 546. It states "[w]hen the

COMP.TXT file is built, the information in the file matches the Commission's component 301 with the Postal Service's component 546 so that the data in BASEYEAR.BIN segment 3 component 301 (3:1) corresponds to the Postal Service's MIR. USPS-T-5, Workpaper A-1 at 15-16.1." Referring to pages 15-16.1 of USPS-T-5, Workpaper A-1, it lists both components 35 and 546. Please explain your understanding of the USPS components 35 and 546 and cite the documentation that provides this information. Include in your explanation whether or not USPS components 35 and 546 are identical in the I.DAT and B.DAT files provided in USPS-LR-6.

- d. Please refer to footnote 6 on page 14 which states "[t]he third row contains 5 data numbers followed by the component identifier." Then an example is given for component 2192 and the explanation is "[t]he third row contains 4 '0's followed by the component identifier". Which is the correct description of the components being converted in BASEYEAR.DAT?

USPS/OCA-T100-8. Please refer to OCA-LR-4, page 15, Part IV that states "[p]rior to executing any of the four cost model programs, XREAD, COSTMOD, LRCOST, and PRMAT, the test files TITLES and ROWCOL.H are reviewed and updated as required." Was this review and update of the test files performed during the process of producing OCA-LR-4? If the response is affirmative, please provide a step-by-step description of how the review and update was accomplished, including a list of the time involved with each step. If the response is anything other than affirmative,

please explain why it was not necessary to perform this review and update of the test files.

USPS/OCA-T100-9. Please refer to pages 19-20 of OCA-LR-4.

- a. The first full paragraph on page 19 states "If the total number of components in the first 23 segments of the Commission's cost model program changes, then the change must be reflected in the appropriate number in the line "ins sc[24]={3,...44}." Did the "total number of components" change so as to require an update to the program to produce OCA-LR-4? If the response is affirmative, please describe the edit process and provide an estimate of the time required. If the response is anything other than affirmative, please provide an estimate of the time required to make the determination that no change was required.
- b. The second full paragraph states "[g]enerally, segment 21 is used to store the results of calculations that become distribution keys; segment 22 acts as temporary working storage; segment 23 stores PESSA cost totals; and segment 24 stores the sum of segments 1 through 20." If these segments are "generally" used as described, please provide a complete list of any exceptions to the rule and provide a complete explanation of why each exception was necessary.
- c. The last line on page 18 and continuing onto page 19 states "In both segments 21 and 22, the maximum number of components available is 99 and which is currently an internal program memory limitation." Has this "memory limitation" caused any programming or execution problems with the Commission's model? If the response is affirmative, please explain in detail how the problems were solved and provide an



estimate of how much time was expended solving these problems. If the response is anything other than affirmative, was the statement made solely to indicate the possibility of a problem?

- d. Referring to the discussion in part c, has there been any study to determine whether or not the "memory limitation" will cause any programming or execution problems in the future? If the response is affirmative, please provide all analyses, documentation and an estimate of the amount of time spent studying this issue. If the response is anything other than affirmative, please provide an explanation of why this issue has not been considered.

USPS/OCA-T100-10. Please refer to the list of components on page 24 of OCA-LR-4 that require manual editing.

- a. Please confirm that the differences range from \$50(000) for Commission component 1807 to \$520,441(000) for Commission component 1810.
- b. For each of these components, please explain in detail the reason(s) for the differences.
- c. Was an analysis performed at the time OCA-LR-4 was being produced to understand the causes of these differences. If the response is affirmative, please provide copies and documentation of all tests performed, all hypothesis tested and an estimate of the amount of time expended for each of the stages of the analysis. If the response is anything other than affirmative, please explain in detail the

reasons why it was decided that these differences were not of such significance so as to warrant further study.

- d. Please list any other differences between BASEYEAR.DAT and the USPS Manual Input Requirement found at this stage, whether due to rounding or any other reason, and explain how these differences were resolved. Please provide documentation for the analysis completed, the results and an estimate of the time expended on this effort.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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January 8, 1998